

**FILED**

JUN 21 2018

Clerk, U S District Court  
District Of Montana  
Billings

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**ATTORNEY FOR PLAINTIFF  
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**LATOYA SHANTELL  
HALVORSEN, *aka Latoya Shantell  
Rivera*, and JERRON MICHAEL  
MITCHELL-FULLER,**

**Defendants.**

**CR 18- *79* -BLG- *SPW***

**INDICTMENT**

**CONSPIRACY TO POSSESS WITH  
INTENT TO DISTRIBUTE  
METHAMPHETAMINE  
(Count I)**

Title 21 U.S.C. § 846  
(Penalty: Mandatory minimum five years  
to 40 years imprisonment, \$5,000,000 fine,  
and at least four years supervised release)

**POSSESSION WITH INTENT TO  
DISTRIBUTE METHAMPHETAMINE  
(Count II)**

Title 21 U.S.C. § 841(a)(1) and  
Title 18 U.S.C. § 2  
(Penalty: Mandatory minimum five years  
to 40 years imprisonment, \$5,000,000 fine,  
and at least four years supervised release)

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**CRIMINAL FORFEITURE**

**Title 21 U.S.C. § 853(a)(1)**

**TITLE 21 PENALTIES MAY BE  
ENHANCED BY PRIOR DRUG-  
RELATED FELONY CONVICTIONS**

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**THE GRAND JURY CHARGES:**

**COUNT I**

That beginning on approximately December 19, 2017, and continuing until on or about February 20, 2018, at Billings and within Yellowstone County, in the State and District of Montana, and elsewhere, the defendants, LATOYA SHANTELL HALVORSEN, *aka Latoya Shantell Rivera*, and JERRON MICHAEL MITCHELL-FULLER, knowingly and unlawfully conspired and agreed with each other and with other persons, known and unknown to the Grand Jury, to possess with the intent to distribute, in violation of 21 U.S.C. § 841(a)(1), five grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 846.

**COUNT II**

That beginning on approximately December 19, 2017, and continuing until on or about February 20, 2018, at Billings and within Yellowstone County, in the State and District of Montana, and elsewhere, the defendants, LATOYA SHANTELL HALVORSEN, *aka Latoya Shantell Rivera*, and JERRON MICHAEL

MITCHELL-FULLER, knowingly possessed, with the intent to distribute, five grams or more of actual methamphetamine, a Schedule II controlled substance, and aided and abetted the same, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

#### FORFEITURE ALLEGATION

Upon conviction of any offense set forth in this indictment, the defendants, LATOYA SHANTELL HALVORSEN, *aka Latoya Shantell Rivera*, and JERRON MICHAEL MITCHELL-FULLER, pursuant to 21 U.S.C. § 853(a)(1) and (2), shall forfeit to the United States, any property constituting or derived from any proceeds obtained directly or indirectly as a result of the violations alleged the indictment and any property used or intended to be used in any manner or part to commit or to facilitate the commission of any offense alleged in the indictment. This property includes, but is not limited to \$1,279.00 in United States Currency found at the residence of LATOYA SHANTELL HALVORSEN, *aka Latoya Shantell Rivera*, and MITCHELL-FULLER.

The United States of America shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p), if any of the property that constitutes or is derived from the proceeds traceable to any offense alleged in this indictment:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

FOREPERSON

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KURT G. ALME  
United States Attorney



JOSEPH E. THAGGARD  
Criminal Chief Assistant U.S. Attorney

Crim. Summons \_\_\_\_\_

Warrant: ☒ Both \_\_\_\_\_

Bail: \_\_\_\_\_